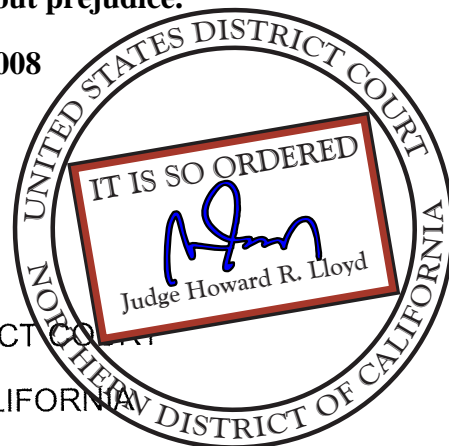


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3 Tel: 408/279-7529  
Fax: 408/298-3306

4 Attorneys for Relator  
5 Donna McLean

**Pursuant to stipulation, the state qui tam claims  
are dismissed without prejudice.**

**Dated: June 23, 2008**



7 IN THE UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA

10 United States of America, ex. Rel. Donna  
M. McLean, et al.,

11 Plaintiffs,

12 v.

13 The County of Santa Clara, a  
14 municipality et al.,

15 Defendants.

NO. C05-01962 HRL

Dismissal of State qui tam Causes of  
Action

16 This is a voluntary dismissal pursuant to Rule 41(a)(1)(ii). The Complaint of  
17 Relator Donna McLean in the within action on behalf of the State of California is  
18 dismissed as to the following causes of action:

19 X. Violations of False Claims Act - California Government Code § 12651(a)(1) by  
20 The State of California as against All Defendants;

21 XI. Violations of False Claims Act - California Government Code § 12651(a)(2) as  
22 against All Defendants; and

23 XII. Violations of False Claims Act - California Government Code § 12651(a)(3) by  
24 Plaintiff The State of California as against Defendants the County of Santa Clara, the  
25 Department of Children and Family Services of Santa Clara County, Epifanio ("J.r.")  
26 Reyna, Dee Schaeffer, M.D., Tommijean Thomas, M.D., and Richard Perillo, M.D.

27 It is agreed by and between Relator Donna McLean and Defendants the County of

28 United States, ex rel., v County of Santa Clara, et al., No. C05-01962 HRL  
Dismissal of Causes of Action on behalf of State of California

1 Santa Clara, the Department of Children and Family Services of Santa Clara County,  
2 Kenneth Borelli, Lawrence Gallegos, Epifanio ("J.r.") Reyna and Tanya Beyers that this  
3 dismissal shall be upon waiver of fees and costs.

4 I declare under penalty of perjury under the laws of the State of California that the  
5 foregoing is true and correct, and was executed by me on June 5, 2008, at San Jose,  
6 California.

7  
8 William C. Dresser  
Attorneys for Relator  
Donna McLean

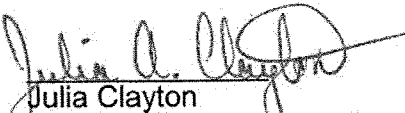
9 Approval for this dismissal is stipulated to by Relator.

10 Dated: June \_\_, 2008

11  
12 Donna McLean  
Relator

13 Pursuant to California Government Code Section 12652(c)(1), the Attorney  
14 General of the State of California, by and through the undersigned, consents to the  
15 foregoing dismissal without prejudice.

16 Dated: June 18, 2008

17   
18 Julia Clayton  
Deputy Attorney General  
Attorneys for State of California

19 Approval for this dismissal is stipulated to on behalf of Defendants County of Santa  
20 Clara, the Department of Children and Family Services of Santa Clara County, Kenneth  
21 Borelli, Lawrence Gallegos, Epifanio ("J.r.") Reyna, and Tanya Beyers by counsel who  
22 has authority from each of these clients to enter into this stipulation for dismissal.  
23

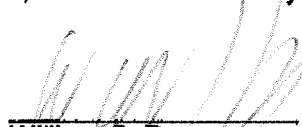
24 Dated: June \_\_, 2007

25 Melissa Kiniyalocts  
26 Attorneys for Defendants  
County of Santa Clara, the Department of Children and Family  
27 Services of Santa Clara County, Kenneth Borelli, Lawrence  
Gallegos, Epifanio ("J.r.") Reyna, and Tanya Beyers

28 US-Count\Pld\DismissS.616

1 Santa Clara, the Department of Children and Family Services of Santa Clara County,  
2 Kenneth Borelli, Lawrence Gallegos, Epifanio ("J.r.") Reyna and Tanya Beyers that this  
3 dismissal shall be upon waiver of fees and costs.

4 I declare under penalty of perjury under the laws of the State of California that the  
5 foregoing is true and correct, and was executed by me on June <sup>19</sup> 5, 2008, at San Jose,  
6 California.

7   
8 William C. Dresser  
9 Attorneys for Relator  
10 Donna McLean

11 Approval for this dismissal is stipulated to by Relator.

12 Dated: June 19, 2008

13   
14 Donna McLean  
15 Relator

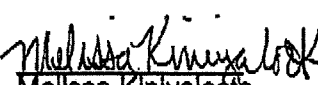
16 Pursuant to California Government Code Section 12652(c)(1), the Attorney  
17 General of the State of California, by and through the undersigned, consents to the  
18 foregoing dismissal without prejudice.

19 Dated: June \_\_, 2008

20   
21 Julia Clayton  
22 Deputy Attorney General  
23 Attorneys for State of California

24 Approval for this dismissal is stipulated to on behalf of Defendants County of Santa  
25 Clara, the Department of Children and Family Services of Santa Clara County, Kenneth  
26 Borelli, Lawrence Gallegos, Epifanio ("J.r.") Reyna, and Tanya Beyers by counsel who  
27 has authority from each of these clients to enter into this stipulation for dismissal.

28 Dated: June 19, 2007

  
Melissa Kinlyaloots  
Attorneys for Defendants  
County of Santa Clara, the Department of Children and Family  
Services of Santa Clara County, Kenneth Borelli, Lawrence  
Gallegos, Epifanio ("J.r.") Reyna, and Tanya Beyers

US-Count\Pld\DismissS.616